

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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In re:

Melvin Corley  
Delois Johnson  
aka Delois Corley

Debtor(s)

**STIPULATION AND ORDER**

**CASE #: 18-35609-cgm  
CHAPTER: 13**

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**PROTECTIVE STIPULATION AND ORDER**

**WHEREAS**, on April 16, 2018, Melvin Corley and Delois Johnson aka Delois Corley (“Debtor’s”), filed a voluntary Chapter 13 petition; and

**WHEREAS**, Wells Fargo Bank, N.A., (“Secured Creditor”) is the holder of a valid and duly perfected mortgage lien against the Debtor’s real property located at and commonly known as and by 42 Hannah Ln, New Windsor, NY 12553-7287 (“Mortgaged Premises”); and

**WHEREAS**, on July 9, 2018, the Court entered the Loss Mitigation Order directing Debtors and Secured Creditor to participate in Loss Mitigation on Loan ending in 4534; and

**WHEREAS**, on December 11, 2018, after due deliberation, the Court Ordered the Secured Creditor to provide the guidelines to the Debtor, regarding loss mitigation decision rendered by the Secured Creditor; and

**WHEREAS**, the Debtors and Secured Creditor, through their respective counsel, wish to enter in to this agreement for a protective stipulation and order; and it is hereby

**STIPULATED AND AGREED AS FOLLOWS:**

1. “Guidelines”, as used in this Stipulation, refers to Secured Creditor’s Loss Mitigation Program and Policy.
2. The Secured Creditor will only produce the Guidelines to Debtors and their counsel, and

they can only be used as necessary in connection with this proceeding.

3. If either the Secured Creditor or the Debtors deem it necessary to file with or present to the Court the Guidelines or any portion thereof, the document containing the Guidelines or portions thereof shall be marked "Confidential" and must be filed in hard copy in a sealed envelope bearing the legend "This envelope filed in this case by [name of party], may not be opened nor the contents revealed except by prior order of this Court." All oral presentations to the court pertaining to the Guidelines are to be held in camera until such time as the court orders otherwise.
4. If Debtors desire to give, show, make available, or communicate the Guidelines or any portion thereof to any person, Debtors must first disclose to Secured Creditor's counsel the person to whom they desire to give or disclose the document or confidential information and obtain the written permission of the Secured Creditor's counsel.
5. Each person besides counsel for the Parties and counsel's employees to whom such material is to be given, shown, made available, or communicated must sign an agreement not to disclose or use the information except in accordance with the terms of this order. If the written consent of Secured Creditor's counsel is not given within five business days after request is made, Debtors may seek leave of Court on notice to make the disclosure in question.
6. When Loss Mitigation has been terminated, Debtors will return promptly to Secured Creditor's counsel all copies made of the Guidelines, and will destroy any electronic copies.

7. This Court shall retain jurisdiction with respect to all matters arising from or related to the implementation or interpretation of this Stipulation.

Dated: February 10, 2019

/s/ H. Scott Ziemelis  
H. Scott Ziemelis, Esq.  
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Dated: February 20, 2019

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**Dated: February 22, 2019**  
**Poughkeepsie, New York**



/s/ Cecelia G. Morris  
**Hon. Cecelia G. Morris**  
**Chief U.S. Bankruptcy Judge**